

**UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS**

UNITED STATES of AMERICA,

Plaintiff,

v.

LI GUO ZONG,

Defendant.

Case No.: CR-07-00029

**MOTION TO VACATE BAIL  
MODIFICATION HEARING**

Hearing Date: January 22, 2008

Hearing Time: 2:00 p.m.

Judge: Hon. Alex R. Munson

Defendant, Li Guo Zong, by and through his counsel of record, hereby requests that the Court vacate the time and date set for Bail Modification Hearing in the above captioned case until further notice. The Bail Modification Hearing in this case is currently set for January 22, 2008 at 2:00 p.m.

Although Mr. Li has identified a person as a potential third party custodian, additional time is needed to allow probation to conduct a background check of that individual. Also, the proposed third party custodian needs additional time to discuss the implications involved with the responsibilities of being a third party custodian with the family members that live on her property. As soon as Mr. Li is confident that he can present an acceptable bail modification package to the Court, defense counsel will make the appropriate motions to have the Bail Modification Hearing reset.

Respectfully submitted this 22<sup>nd</sup> day of January, 2008.

\_\_\_\_\_/s/\_\_\_\_\_  
Kelley M. Butcher, Esq.